

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

v.

ROY ORON, an individual; MAAYAN
MARZAN (aka MAAYAN ALMOG), an
individual; CLICKOMY, LTD., an Israeli
company; RASHEED ALI, an individual;
PETER BRADFORD, an individual; CASH
NETWORK, LLC, a Nevada limited liability
company; JEFFREY GILES, an individual;
DALE BROWN, an individual; FIRST
IMPRESSION INTERACTIVE, INC., an
Illinois corporation; and JOHN DOES 1–10,

Defendants.

No. 2:19-cv-00523-RSM

STIPULATED PERMANENT
INJUNCTION

STIPULATION

Plaintiff Amazon.com, Inc. and Defendants First Impression Interactive, Inc., Jeffrey
Giles, and Dale Brown (collectively “Parties”), by and through their respective counsel of
record, notify the Court that the parties have reached a settlement of all claims in this matter.
Pursuant to the terms of that settlement, the Parties stipulate and agree to entry of the
permanent injunction below.

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3 DATED: March 4, 2020
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Interactive, Inc., Jeffrey Giles, and Dale
Brown*

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20 **PERMANENT INJUNCTION**

21 Pursuant to the above stipulation of the parties, IT IS HEREBY ORDERED that
22 Defendants First Impression Interactive, Inc., Jeffrey Giles, and Dale Brown, and their
23 respective directors, shareholders, officers, employees, agents, successors and assigns, and all
24 others in active concert or participation with them, are enjoined and restrained from:
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1 1. Using counterfeit versions of any trademarks registered by Amazon (or its
2 subsidiary, Amazon Technologies, Inc.) as of this injunction's entry date with any advertising,
3 marketing, offer for sale, promotion, display, publication, website, voicemail, email, or
4 software;

5 2. Using any false designation of origin or false or misleading description or false
6 or misleading representation that can or is likely to lead the trade or public or individuals
7 erroneously to believe that any website, voicemail, email, advertising, or other marketing
8 materials has been produced, distributed, displayed, licensed, sponsored, approved or
9 authorized by or for Amazon, when such is not true in fact;
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11 3. Engaging in any other activity adjudicated to be an infringement or dilution of
12 any trademarks registered by Amazon (or its subsidiary, Amazon Technologies, Inc.), or of the
13 Amazon parties' rights in, or right to use or to exploit, such trademarks or services marks for
14 the pecuniary benefit of Jeffrey Giles, Dale Brown, or First Impression Interactive, Inc.; and
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16 4. Knowingly and materially assisting any other person or business entity in
17 engaging in or performing any of the activities listed above.

18 Additionally, the Court shall retain continuing jurisdiction over this matter for the
19 limited purposes of enforcing the terms of the Parties' settlement agreement and this Stipulated
20 Permanent Injunction.
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22 DATED THIS 18 day of March 2020.

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25 RICARDO S. MARTINEZ
26 CHIEF UNITED STATES DISTRICT JUDGE
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